

**REMARKS**

Selected claims have been amended to place them in independent form with some modification. Note that claim 3 in particular has been rewritten in independent form, but without including the limitations of claim 2 and including the “references thereto” language. The dependencies of other claims have been changed because the claim from which they depended was cancelled. Claims 1, 14, 19, 20, 24, 25, 27, and 19 have been cancelled. Also, claims 15, 21, 26, and 30 have been amended to include substantially the limitation of dependent claim 3. Since claim 3 was searched previously, this should not require any further searching.

This Amendment **changes** claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, are presented, with an appropriate defined status identifier.

In the Office Action, claims 1-18, 25 and 26 were rejected under 35 U.S.C. § 103 as being obvious over Fuh et al. (6,463,474) in view of Desai et al. (6,820,204). Additionally, claims 19-24 and 27-30 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. patent 6,463,474 to Fuh et al. (hereafter “Fuh”). Applicants respectfully traverse these rejections for at least the following reasons.

Fuh disclosed a network device configured to optimize traffic through a router firewall. See the Field of the Invention in Fuh. The network device intercepts traffic initiated from a user’s client and directed toward a network resource, such as a web site, and authenticates the user by comparing information identifying the user to authentication information stored in the router network device. If there is an authentication, the router network device is dynamically reconfigured to allow network traffic initiated by the user to reach the network resource. In one embodiment, the Fuh design is used to control access to web sites, such as pornographic web sites, that the company has determined to block. See Column 1, lines 28-30.

Column 12, lines 35-40 were cited as disclosing a plurality of profiles. It is noted that there is no disclosure of multiple profiles for a single user. Additionally, the profiles of

different users are located in a database 220 on the network side that is accessed by the server 218. See column 12, lines 33-37. Claim 3 which claims this limitation has been rewritten independent form, but without the claim 2 dependency and with the “references thereto” language. Note that the examiner cites Fuh et al. at column 5, line 57 – column 6, line 15 as meeting the claim 3 limitation. However, this citation supports the fact that the Fuh et al. profiles or references thereto are located on the “network device” and not on the “imaging client.” Accordingly, claims 15, 20, 26 and 30 have amended to include this limitation also to provide consistency of argument.

Note that in Fuh et al. there is no point to having multiple different profiles for a single user. The purpose of Fuh et al. is to control access by selected users based on their identification, not what might be in a profile, to the network to guard against unwanted network traffic. See column 1, lines 21-30. Fuh et al. just needs to know the user’s identity to perform its intended function.

Additionally, there is no disclosure in Fuh of a profile with references to external network resources, per the claim language “with each different user profile including a reference to a different composition store and a different graphic store.” Citation is made by the examiner to Fig. 4 of Fuh et al. and elements 422, 424, 426 and 428, and to column 9, lines 30-55 as disclosing a network service composition store and graphic store. As is evident from Fig. 4, these elements are on the server side, not the client side. Additionally, Fuh is deficient in that this section only discusses IP addresses and allowable client protocols and external and internal interfaces. It does not disclose a network service graphics store or a network service composition store, as those terms are defined in the specification. See the definitions for “Composition,” “Graphics Data,” “Composition Store,” and “Graphics Store” set forth in the specification. Fuh et al. states at column 9, lines 38-55 as follows regarding 424 and 426:

“Access control lists filter packets and can prevent certain packets from entering or exiting a network. Each ACL is a list of information that firewall

router 210 may use to determine whether packets arriving at or sent from a particular interface may be communicated within or outside the firewall router.

For example, in an embodiment, input ACL 424 may comprise a list of IP addresses and types of allowable client protocols. Assume that firewall router 210 receives an inbound packet from client 306 at external interface 420 that is intended for target server 222. If the IP address of client 306 is not stored in input ACL 424, then firewall router 210 will not forward the packet further within the circuitry or software of the firewall router. Output ACL 426 similarly controls the delivery of packets from firewall router 210 to resources located outside external interface 420. Input ACL 428 and output ACL 430 govern packet flow to or from internal interface 422.” (Emphasis added.)

The disclosure of a list of IP addresses in Fuh et al. is not a teaching or even a suggestion of a network service “composition store” and a network service “graphics store”, much less a teaching or suggestion of a “different composition store and a different graphics store” included in each of the plurality of user profiles.

Desai et al. discloses a system wherein each user has a single profile with each single profile having a plurality of data elements. See column 4, lines 1-18. A user may grant access to different data elements in the single profile to different parties on a data element by data element basis using public and private keys in accordance with the method of Fig. 7, or may provide passwords for each data element view. See column 13, line 53 – column 14, line 17.

Desai et al. does not contain references to network services such as graphic stores and composition stores. Additionally, these view operations are taking place on the server side. See Fig. 1 and column 8, lines 27-35 and Fig. 5 and column 12, lines 18-27.

Desai et al. has nothing to do with accessing network service graphics stores and network service composition stores associated with the user through a user profile or referenced in the user’s imaging client.

Additionally, there is no motivation in one of ordinary skill in the art to modify the Fuh et al. device, which controls access through a router firewall via a list of authorized

profiles for different users, with the teachings of Desai et al. relating to a user granting access to different data elements in a single profile to different parties on a data element by data element basis using public and private keys. It is not clear why someone of ordinary skill would make such a modification and it is not clear what would result. In other words, how does one modify an access control list for a firewall router with profile data elements and what would be the point? Additionally, both Fuh et al. and Desai et al. are on the server side, so that even if such a combination could be made (which it cannot), it still would not meet the claims. Likewise, even if the combination could be made (which it cannot), neither reference discloses profiles or references thereto in an imaging client wherein the profiles include references to network service composition stores and network service graphics stores. Thus, a prima facie case under the MPEP has not been made.

Note that claims 6 and 18 relating to making a selection of a profile based on the selection criteria being the identification, not of the user, but of the particular imaging client being used by the user, have been rewritten in independent form. This feature is not disclosed in either reference. The examiner cites Fuh et al. at column 12, lines 30-35 relating to the username and password. This is not a disclosure of an identification of an imaging client, but rather of the user's identity. Thus, Claims 6 and 18 are allowable for this reason, and also for the failure of either patent to disclose references in a profile to network service composition stores or network service graphics stores.

Note that claims 21 has been rewritten in independent form and also incorporates the limitation of cancelled claim 24 and the aspect of claim 3 relating to location in the imaging client of the profile or a reference thereto. The claim should be allowable for the reasons stated above relating to the elements being in the imaging client and further because of the method in the imaging client to select a composition from the network service composition store, which is not disclosed in the art. Note that references in the profile to a default composition and/or default graphic and default graphics store and default composition store in this claim as well as claims 9-13 and 23 facilitates an electronic dialogue with another network resource selected by the user, so that that network resource can determine from a selected user profile the user's desired default composition and default graphic in order to perform their respective network service thereon.

In view of the foregoing amendments and remarks, reconsideration and withdrawal of the rejection is requested. Applicants submit that the application is now in condition for allowance. If there are any questions regarding the application, or if an examiner's amendment would facilitate the allowance of one or more of the claims, the examiner is courteously invited to contact the undersigned attorney at the local telephone number below.

Respectfully submitted,

Date 2/11/05

By 

FOLEY & LARDNER LLP  
Telephone: (202) 672-5485  
Facsimile: (202) 672-5399

William T. Ellis  
Attorney for Applicant  
Registration No. 26,874